



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMMISSION FOR THE
PRESERVATION OF WILD HORSES

123 W. Nye Lane, Room 230
Carson City, Nevada 89706-0818
Phone (775) 687-1400 • Fax (775) 687-6122

May 23, 2000

Jeffrey Steinmetz
BLM-Las Vegas Field Office
4765 W. Vegas Dr.
Las Vegas, NV 89108

Dear Jeff,

The Commission for the Preservation of Wild Horses has a long history in the management and protection of wild horses on the Nellis Range. I use that term loosely as "range" seems to be determined with changes in Commanders and personnel overseeing the range. Depending on personnel in charge either horses are encouraged to wander where they can survive with forage and water availability or a new person may come into the game wanting horses only on the original range. It is impossible for the horses to keep up with changing boundaries. Two years ago 5 critical waters were fenced off from use by wild horses without any environmental documentation or review. It is critical that a "range" for wild horse use be determined and written in stone so as to not change with every change in administration, and that all actions are documented, not hidden. With the range determination, waters need to be developed within the boundaries to encourage horses to maintain their boundaries. The forage/water availability needs to be the critical determining factor in setting AML. The constant cycling of horses dying on the range is unacceptable.

Another problem is that access to the range seems to be denied or grossly delayed. The horse specialist in the Las Vegas District, Gary McFadden has not been out on that range in almost 2 years which makes it impossible for him to monitor the herds to insure their health and safety, in addition to forage/water availability. We would like to know why his access has not been approved. Please advise this Commission who, in the military, is responsible for this delay as we intend to investigate this situation. In addition, on March 31, 2000, at a Commission meeting in Las Vegas, this State Commission requested that the Bureau arrange a tour for the Nellis range so we may investigate our concerns. We did not receive any confirmation of a tour and weeks ago have since sent a letter to the Las Vegas Field Manager with copy to the State Director, Bob Abbey. We have not heard yet that any arrangements are being made. There has been no request for names and information of Commissioners and myself to verify security clearances. We do wonder why and request a response?

Jeffrey Steinmetz
May 23, 2000
Page 2

Regarding our concerns for the Nellis Range Management Plan Scoping. As you know, we have been involved for many years in the horse management situations on Nellis. For your scoping, requests please include:

1) Determination of the area of use that wild horses will have established. If it is to be the original range, the 1971 area of use, or current "herd use area". This should be established and developed for their use ie: waters, etc.

2) The Commission has a concern for the water quality of the waters available for horse use. With a higher than average instance of deformities on Nellis horses versus other herds in Nevada, we are requesting that a water survey, to include quantity and QUALITY, be conducted on all waters available to wild horses and included in the management plan determination of AML and suitable range.

3) AML be established on the limiting years of forage availability and horses managed under the established AML. The horses should not be allowed to exceed their carrying capacity in order to prevent emergency situations.

BLM determines AML by use of desired utilization of key forage species and observed use pattern mapping data. This data is averaged over the years of the evaluation.

We have reviewed the range survey that had been contracted to "determine" and suggest carrying capacity and AML. Since we assume that the survey will be included in monitoring data determining AML in the Range Management Plan, our comments/observations on that document are as follows:

The contractor estimated the amount of forage in pounds and divided it by the AUMS to determine the appropriate management level. The assumptions made in the carrying capacity calculations are fairly creditable:

1. The entire Nevada Wild Horse Range is neither suitable nor used by wild horses. By assessing the waters, forage and landscape, the contractor determined that only 51.5 percent of the NWHR was suitable for wild horses (204,145 Acres).

2. Wild horse use of vegetation within 4 miles of water should be 55% (Desired Utilization).

3. Wild horse use of vegetation within 8 miles of water should be 25% (Desired Utilization).

4. Forage production and AML should be determined on a poor range year (1998).

Jeffrey Steinmetz
May 23, 2000
Page 3

5. Precipitation is directly proportional to annual production. (Extremely true in the Mojave Desert and ephemeral vegetation types.)

6. One AUM is equal to one adult horse.

Based upon the suitability of the NWHR and production of vegetation within an 8 mile radius of water, the contractor found that 227 horses was the AML and the range should be reduced in half.

If there are any flaws in the assumptions it would be in the production of vegetation during wet years when it can exceed a 1000 percent over a dry year. In other words, the selection of 1998 might have had more variance than the few years of monitoring data provided. Also, the assumption that wild horses do not forage further than 8 miles might be too conservative. In any light, the contractor is probably within reason.

Remember that in August 1991/92 the BLM estimated 6,200 wild horses on the northern portion of Nellis. By January there were 4,300, a tragic and preventable loss. When we went down there, in August 1994, with Allen, we had agreed that the AML would probably be 300 and take all the others off the adjacent ranges. With the data provided, you can support 227 as the AML for only the original NWHR. Otherwise, through public scoping and consensus, re-arrange the boundaries to encompass more suitable habitat and adjust the AML appropriately.

Please insure to keep this State Commission on the direct mailing list for all participation in any actions affecting wild horses and/or their habitat in your District. If you have any questions, please feel free to contact me directly.

Sincerely,



CATHERINE BARCOMB
Administrator

cc: Bob Abbey, BLM, Nevada State Director
Paul Liebendorfer, Chief, Bureau of Federal Facilities
Alan Biaggi, Administrator, Environmental Protection
John Walker, Research Analyst, Bureau of Federal Facilities
Nevada State Clearinghouse

Nellis Plan Comments

Beatty and Tonopah - No comments were submitted for the record, however we will be receiving comments from Nye County within the next month.

Pahrump - No written comments provided at the meeting.

Amargosa Valley - Comments from Ralph McCracken;

1. Do not reduce horse water supplies.
2. Maintain heard on Nellis Range 500-800, not 10,000.
3. Expand WH&B area with normal ranging activities of the horses.
4. Reach equilibrium between habitat and animals.
5. Good study area for birth control for herd improvement - introduce genetic variety for viability.
6. Continue development of water and springs for WH&B.
7. Allow members of the WHOA groups access to maintain water holes and the herd. Coordinate with the military.
8. Nellis has quality animals. The herd should be maintained as a source of good adoptable animals.

Alamo - comments from Marta Agee.

1. Conduct comparative studies on and off the range for wildlife numbers based on water developed for wildlife and livestock.
2. Use RAC recommendation for the lowest forage production years to determine herd capacity.
3. Allow livestock grazing within the range wherever it is compatible with military activities. Two areas were identified on a map which is part of the record.
4. Recognize local economic needs, through access on the north end of the range. Local recruitment for jobs. Other incentives for local hiring, contracting etc.
5. Need a north/south access road.
6. Flexibility in the plan to accommodate changes in the military mission and use areas, to fit local needs within a 20 year planning period.
7. Control Noxious Weeds
8. Review renewal comments. Marta submitted a typed set of comments, 3 pages long.

Other comments

9. Jet fuel fumes and debris as at McCarren relating to air quality and quality of the environment, is it detrimental for people as well as animals?
10. How to balance our quality of life.
11. Sonic boom effects on animals.

Las Vegas - Comments from 5 people combined.

1. SAIC report is flawed!
 - a. Animals range farther than 8 miles
 - b. Animals eat forage other than grass
 - c. Page 2-4, does WH use area = NWHR? Ask SAIC
 - d. Ask SAIC to give presentation to NWSA. They meet the 2nd Monday of each week
 - e. Forage allocation parameters inaccurate too many assumptions
2. Possibility to access the range to assist in maintaining projects etc.
3. BLM needs to fill out paperwork correctly for non BLM employees access, including the NV Wild Horse Commission. Work plan needed.
4. BLM should complete the studies identified in the existing plan.
5. Define actual 1971 herd use area and an alternative including expansion to the 1971 use area.
6. Allocate water for riparian habitat and other animals. Ensure all are in PFC, proper functioning condition. Maintain PFC.
7. Manage range for high level of biodiversity. Native vegetation as high a percent as possible. Control of non native vegetation critical.
8. Restoration of native ungulates to pre contact levels and state of health.
9. Look at potential to develop waters in areas where no conflict with military exercises would occur. Ease pressure on existing water sources.
10. Management plan needs to consider ROW through Nellis range for high level waste shipments to Yucca Mountain. Call for cooperation between Nellis and DOE.
11. The entire area needs to be evaluated for Wilderness potential and areas which qualify should be managed as such. Roadless areas greater than 5000 acres need to be identified.
12. Fire management - Allow natural fires to burn. Try to return to a more natural fire regime. Use prescribed fire as a tool to achieve vegetational mosaic.
13. Cultural resource site need to be identified and protected.
14. Actively collect and maintain a photographic record of changes to the landscape (flora) over time.
15. How will that portion of the DNWR which is overlain by the Nellis range be managed for its wildlife values?
16. How will wilderness values be retained on the DNWR and in adjoining WSA's including Kawich and Reveille WSA's.
17. Has this entire area been surveyed for T&E species?
18. Protection of water resources from contamination and depletion due to off-area groundwater pumping.
19. As much info on groundwater should be obtained as possible by active studies.